

# Akin Gump

STRAUSS HAUER & FELD LLP

JAMES JOSEPH BENJAMIN, JR.  
+1 212.872.8091/fax: +1 212.872.1002  
jbenjamin@akingump.com

November 9, 2022

**VIA ECF**

The Honorable Judge John G. Koeltl  
United States District Court Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

11/9/22

Re: *United States v. Hayes, et al.*, No. 20 Cr. 500 (JGK)

Dear Judge Koeltl:

We respectfully submit this letter on behalf of Arthur Hayes to request leave to file a letter with the Court under seal. A redacted copy of the letter, which requests modification of the conditions of Mr. Hayes's probation pursuant to 18 U.S.C. § 3563(c), is attached to this letter motion. We respectfully seek leave from the Court to file our letter under seal because the contents of the letter include material that implicate Mr. Hayes's personal privacy and security. An unredacted version of Mr. Hayes's letter will be delivered to Chambers via email in electronic form.

We are available at the Court's convenience to discuss any questions. Thank you.

Respectfully Submitted,



James Joseph Benjamin, Jr.

cc: AUSAs Jessica Greenwood, Samuel Raymond, and Nathan Rehn (*via ECF*)  
USPO Harry Marcelin (*via email*)

ENCLOSURE.